

## **REMARKS/ARGUMENTS**

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application into condition for allowance. The present amendment is being made to facilitate prosecution of the application.

### **I. STATUS OF THE CLAIMS AND FORMAL MATTERS**

Claims 1-13, 25 and 39-54 are currently pending. Claims 1, 13 and 25, which are independent, are hereby amended. Claims 14-24 and 26-38 are canceled, without prejudice or disclaimer of subject matter. No new matter has been introduced. Support for this amendment is provided throughout the Specification as originally filed, and specifically at page 12, lines 1-16. Changes to claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

### **II. REJECTIONS UNDER 35 U.S.C. §102(e)**

Claims 1-13, 25 and 39-54 were rejected under 35 U.S.C. §102(e) as allegedly anticipated by U.S. Patent No. 6,178,205 to Cheung et al.

Claim 1 recites, *inter alia*:

“An image processing apparatus...

wherein said motion vector is computed by the expression:  $V = m \times v_x + v_y$ , where  $v_x$  is a horizontal component of said motion vector,  $v_y$  is a vertical component of said motion vector,  $m$  is an integer value, and  $v_x$  and  $v_y$  are in a range between  $-m/2$  and  $m/2$ .” (emphasis added)

As understood by Applicants, U.S. Patent No. 6,178,205 to Cheung et al. relates to a post-filtering process for improving an appearance of a video image that includes motion compensated temporal filtering and spatial adaptive filtering. For each target pixel being filtered, the temporal filtering uses multiple motion vectors and one or more pixel values for a prior frame to determine one or more reference values for the target filter. In one embodiment, a weighted average of multiple motion vectors for blocks near or containing the target pixel value provides a filter vector that points to a pixel value in the prior frame. This pixel value is a reference value for the target pixel value and is combined with the target pixel value in a filter operation.

Applicants submit that Cheung does not teach or suggest the above-identified features of claim 1. Specifically, Applicants submit that there is no teaching or suggestion of a motion vector that is computed by the expression:  $V = m \times v_x + v_y$ , where  $v_x$  is a horizontal component of the motion vector,  $v_y$  is a vertical component of the motion vector,  $m$  is an integer value, and  $v_x$  and  $v_y$  are in a range between  $-m/2$  and  $m/2$ , as recited in claim 1.

Therefore, Applicants submit that independent claim 1 is patentable.

For reasons similar to or somewhat similar to those described above with regard to independent claim 1, amended independent claims 13 and 25 are also believed to be patentable.

Therefore, Applicants submit that independent claims 1, 13 and 25 are patentable.

### III. DEPENDENT CLAIMS

The other claims are dependent from one of the independent claims, discussed above, and are therefore believed patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

### CONCLUSION

In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited reference, it is respectfully requested that the Examiner specifically indicate those portions of the reference, providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Respectfully submitted,

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